

## Attachment C: Bureau of Water

### Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.1: Water Safe to Drink				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Dave McMillan/Mike Crumly	In FY2014 and FY15, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Dave McMillan/Mike Crumly	In FY2014 and FY15, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	In FY2014 and FY15 minimize risk to public health through source water protection for 50% of CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	By FY2014 and FY15, minimize risk to public health through source water protection for 42% of the population served by CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	<b>2014 Status:</b>  <b>2015 Status:</b>

SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment Rules.	Dave McMillan/Rick Cobb	In FY2014 and FY15, 90% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-SP2	By FY2012, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months).	U.S. EPA, Region 5	This measure is generated by U.S. EPA through a database query and calculation with a target of 95% person months of the affect population receiving compliant water.	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).	Geoff Andres	The Illinois EPA will maintain a pace of loan program activity that maximizes the availability of low interest financing for public water supply projects in Illinois.	<b>2014 Status:</b>  <b>2015 Status:</b>
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative)	Geoff Andres	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	<b>2014 Status:</b>  <b>2015 Status:</b>

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.3 Water Safe for Swimming				
Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SS-1		Amy Dragovich	<u>Combined Sewer Overflow (CSO) Permits</u> – Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Amy Dragovich	Illinois EPA will utilize the permit language pertaining to all wet weather discharges, as approved by USEPA, to assure compliance with Clean Water Act requirements.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Amy Dragovich	Illinois EPA will provide a pre-public notice permit for the City of Chicago CSO permit upon issuance of the MWRDGC permits and issue a final permit within 90 days of issuing MWRD permits for Stickney, Northside, and Calumet WRPs, unless a public hearing is necessary. If a public hearing is necessary, the permit will be provided within 90 days of the hearing date.	<b>2014 Status:</b>  <b>2015 Status:</b>
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated in to an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: Implementation of an approved Long Term Control Plan (LTCP); or Implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.	<b>2014 Status:</b>  <b>2015 Status:</b>
SS-1 + Clean Water Action Plan		Amy Dragovich	Once the schedule is finalized Illinois EPA will send an update to Region 5 by the end of every month. Illinois EPA will update USEPA CSO LTCP status spreadsheet, internal monthly reporting, and to track progress toward meeting goals under the CSO Control Plan Policy.	<b>2014 Status:</b>  <b>2015 Status:</b>

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis				
Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative)	Geoff Andres	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the “green project reserve”.	<b>2014 Status:</b>  <b>2015 Status:</b>
SP-10	Measure W	Amy Walkenbach	Measure W tracks watersheds where water quality conditions have improved by using a watershed approach. One of the primary purposes of this measure is to model and demonstrate the effectiveness of the watershed approach. Illinois EPA has previously submitted Jelkes Creek, Dutchman's Creek, Governor Bond Lake and Pittsfield watersheds. We now submit Indian Creek-Lake County and Lake Vermilion for consideration under this measure.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained (cumulative.)	Amy Walkenbach	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database.	<b>2014 Status:</b>  <b>2015 Status:</b>

WQ01a	Number of numeric water quality standards for total nitrogen and for total phosphorus adopted by States & Territories and approved by USEPA, or promulgated by EPA, for all waters within the State or Territory for each of the following waterbody types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280.)	Bob Mosher	The Illinois EPA will continue to work with Region 5 to adopt nutrient water quality standards.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bob Mosher	Illinois EPA will continue participation in the Regional effort to develop nutrient criteria guidance through its membership in the Regional Technical Assistance Group.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bob Mosher	Coordinator will work with the Science Committee of the Nutrient Standards Workgroup.	<b>2014 Status:</b>  <b>2015 Status:</b>
WQ26	Number of states and territories implementing nutrient reduction strategies by (1) setting priorities on a watershed or state-wide basis, (2) establishing nutrient reduction targets, and (3) continuing to make progress (and provide performance milestone information to EPA) on adoption of numeric nutrient criteria for at least one class of waters by no later than 2016	Bob Mosher Marcia Willhite	<p>Statewide Nutrient Reduction Strategy—Illinois EPA, in collaboration with the University of Illinois, Illinois Department of Agriculture and a broad range of stakeholders, will develop a statewide nutrient reduction strategy, focused on in-state water quality impairments as well as contribution to Gulf of Mexico hypoxia, based on the 2011 USEPA framework. A final strategy will be provided to Region 5 by August 2014.</p> <p>Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates from mutual agency agreement, as needed each summer if there has been slippage to major milestones in the plan.</p>	<b>2014 Status:</b>  <b>2015 Status:</b>

WQ03a	Number and national percent of States & Territories that within the preceding 3 year period, submitted new or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.	Bob Mosher	<p>Consistent with the requirements of 40 CFR 131.20 (c ) where Illinois EPA proposes new or revised criteria that differ from USEPA's recommended criteria or for parameters where there are no USEPA recommended criteria, Illinois EPA will provide technical documentation for the decision it makes with respect to selecting data for use in calculating the criteria.</p> <p>Where USEPA national criteria exist, Illinois EPA will announce in its annual program plan, beginning in FY13, what standards, such as ammonia, human health narrative, bacteria, it will seek to update through the Illinois Pollution Control Board.</p> <p>By September 30, 2013, Illinois EPA and U.S. EPA will discuss Illinois EPA's review of adjusted standards and site specific criteria approved by Illinois PCB since January 2000 to identify those which should have been submitted to USEPA for its approval under Section 303(c) of the Clean Water Act. By October 31, 2013, Illinois EPA and EPA will develop a plan to bring such regulatory reliefs into compliance with the Clean Water Act requirements.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
	Human Health Criteria	Bob Mosher	Illinois EPA will propose updated human health criteria within the triennial review period beginning in FY14.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Bob Mosher	Illinois EPA will propose an update for bacteria standards to the Illinois Pollution Control Board by December 2015.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
	Great Lakes Initiative Clearinghouse	Bob Mosher	If any criteria applicable to the Great Lakes are updated, Illinois EPA will send USEPA completed criteria templates and fact sheets for upload to the GLI Clearinghouse.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

	Endangered Species Act Consultation	Bob Mosher	Illinois EPA will assist USEPA in coordinating with U.S. Fish and Wildlife Service on draft and final new and revised water quality standards.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Lower Des Plaines River & Chicago Area Waterway UAA	Roy Smogor Bob Mosher Scott Twait	Illinois EPA will continue to support completion of the rulemaking and will actively work with USEPA to address concerns raised on proposed rules and U.S. EPA disapproved rules.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Intensive Basin Surveys</u> – Illinois EPA will conduct Intensive Basin Survey monitoring activities at approximately 125-140 sites annually. Major river basins planned to be monitored in FY14 include the Green, Upper Illinois, Vermilion (Illinois River), Mississippi Central, Mississippi North Central, Bear, Mississippi South, and Cache. Major river basins planned to be monitored in FY15 include the Mississippi North, Apple/Plum, Kankakee, Iroquois, Mackinaw, Spoon, Mississippi South Central, Wood/Piasa, Saline, and Ohio River tributaries.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Facility-Related Stream Surveys</u> – Illinois EPA will conduct up to five (5) facility-related stream surveys annually	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Ambient Lake Monitoring Program</u> – Illinois EPA will conduct monitoring activity at approximately 35-45 inland lakes annually.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Volunteer Lake Monitoring Program (VLMP)</u> – Illinois EPA will conduct VLMP Tier 1 monitoring at approximately 150-160 inland lakes and Tier 2 monitoring at approximately 40-50 inland lakes annually.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Fish Contaminant Monitoring Program</u> – Illinois EPA will work cooperatively with the Illinois DNR, Illinois DPH, and Illinois DOA to collect fish from approximately 75-85 waterbody stations, analyzing a total of approximately 375-425 fish contaminant samples annually.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Gregg Good	<u>Special Surveys</u> – Special surveys are periodically conducted on an as-needed basis to meet lakes, NPS/watershed, permitting, or other program needs. The number and brief summaries of special surveys conducted by the Agency will be reported on an annual basis.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Lake Michigan Monitoring Program</u> – Illinois EPA will conduct lake Michigan near shore survey monitoring at 25 probabilistically-based sites on an annual basis. If time and resources allow, 2-3 Lake Michigan harbors, and 3-4 public water supply intake locations, will be monitored annually.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>Wetland Assessments</u> – Upon completion of the Wetland Index of Biotic Integrity (w-IBI) developed by the Illinois Natural History Survey (INHS), the Illinois EPA agrees to work with Illinois NHS and Region 5 to see how best to incorporate the w-IBI into a methodology to assess attainment of wetland use(s) in the 2016 Section 305(b) report.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>National Aquatic Resource Surveys</u> – Under Joint Funding Agreement with the Illinois-USGS, Illinois EPA will participate in the second year of the National Rivers and Streams Assessment with monitoring to take place in Summer 2014. Illinois EPA will make a commitment by approximately July 2014 whether it will participate in the National Coastal Condition Assessment with monitoring to take place in Summer 2015.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good	<u>STORET</u> – Illinois EPA will continue to submit regular updates of water quality information to STORET via the AWQMS database.	<b>2014 Status:</b>  <b>2015 Status:</b>



		Gregg Good	<u>Water Quality Monitoring Strategy Development 2013-2018</u> – In developing the 2013-2018 Illinois Water Monitoring Strategy, consideration will be given to comments provided by USEPA on Illinois EPA’s previous strategy; new state and federal priorities; availability of Illinois EPA staff and financial resources; technical capabilities; etc. Region 5 and Illinois EPA will work together to develop a draft of the strategy which will be submitted to USEPA for review and comment by December 31, 2013. USEPA’s review comments will be provided back to Illinois EPA by February 28, 2014. The final strategy will be developed by May 30, 2014.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Gregg Good Roy Smogor	By July 15, 2013, Illinois EPA will have been provided with a final report developed in conjunction with Midwest Biodiversity Institute (MBI) and Region 5 that provides an assessment of the resources necessary to run a Level 4 biological assessment program. By December 31, 2013, Illinois EPA will inform Region 5 whether it will fully commit to development of a TALU-based monitoring assessment, and implementation program in Illinois. If the Illinois EPA commits to doing so, a plan of action with milestones will be drafted and forwarded to Region 5 by March 31, 2014.	<b>2014 Status:</b>  <b>2015 Status:</b>
	303 (d) List Development	Amy Walkenbach	The final 2014 303(d) List will be submitted to USEPA on by April 1, 2014. The 2016 draft 303(d) List will be provided to Region 5 and the public by May 2015 for review and comment with a a hearing in July 2015. The final 2016 303(d) List will be submitted to USEPA by April 1, 2016.	<b>2014 Status:</b>  <b>2015 Status:</b>

WQ-08b	Number and national percent, of approved TMDLs, that are established by States and approved by USEPA [state TMDLs] on a schedule consistent with national policy.	Amy Walkenbach	<ul style="list-style-type: none"> <li>Continue watershed based TMDLs according to the request for proposal (RFP). Illinois EPA will start at least four new TMDL watershed projects every six months.</li> <li>In FFY15 Illinois EPA will begin TMDLS, funded through 319 funds within the PPG, these watersheds are: Bonpass Creek, Horseshoe Lake (Alexander Co.), Galena/Sinsinsawa Rivers, Spring Lake and Little Vermilion (Livingston Co.). Additional watersheds will be added in FFY16.</li> <li>Deliver a schedule to Region 5 by September 15 of each year, of final TMDLs to be submitted for approval by Region 5 in each subsequent FFY.</li> <li>Illinois EPA will address 70 segment impairments through completed TMDLs.</li> <li>Provide draft TMDLs to Region 5, 30 days prior to public notice, or alternative timeframe as agreed upon, for review and comment.</li> <li>Develop implementation plans for all 319 funded TMDLs.</li> </ul>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
		Amy Walkenbach	Deliver a schedule to Region 5 by September 15 of each year, of final TMDLs to be submitted for approval by Region 5 in each subsequent FFY.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
		Amy Walkenbach	Illinois EPA will address 135 segment impairments through completed TMDLs, new accountability projects, SP-11 delistings and reassigned Cat 5 impairments to Cat 4b and Cat 4c. Any other delistings resulting in impairments being removed from Category 5 will be taken from the universe of TMDLs needed and the proportional annual reduction equivalent to 1/13 of a TMDL, applied to the annual segment-impairment commitment of 125. It is the intent of Illinois EPA to address 75 segment-pollutant combinations through TMDL development.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

		Amy Walkenbach	Provide draft TMDLs to Region 5, 30-60 days prior to public notice, or alternate timeframe as agreed upon, for review and comment.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Amy Walkenbach	Illinois EPA will work with Region 5 to make TMDL process in Illinois more efficient and to ensure that Illinois EPA remains on pace in TMDL development.	<b>2014 Status:</b>  <b>2015 Status:</b>
	In recognition that TMDLs developed by Illinois EPA are funded primarily with CWA Section 319 funds, TMDLs will be developed consistent with waters identified (either specifically, or by priority watershed) in Illinois EPA's approved Nonpoint Source Management Program Plan (NPSMP).	Amy Walkenbach	TMDLs will either address the nine elements for watershed based plans as described in EPA's Final NPS Program and Grants Guidelines for States and Territories, App. C (April 2013), or be accompanied by separate implementation plans meeting the nine elements, to provide the basis for implementation project funding with CWA Section 319 funds.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Nonpoint Source Management Program Plan. Illinois EPA last updated its NPSMP in 2001.	Amy Walkenbach	Illinois EPA will work with the Region to complete revisions and submit an approvable revised Plan by Dec. 31, 2013. Illinois EPA will implement the Plan upon approval, and will, on an annual basis, review the approved NPSMP and update as necessary.	<b>2014 Status:</b>  <b>2015 Status:</b>

	NPS workplan and 319 grant application.	Amy Walkenbach	<p>Illinois EPA will submit, and Region 5 will review and approve annual NPS workplans consistent with the EPA's Final NPS Program and Grants Guidelines for States and Territories, and will take action to award 319 grants in accordance with the following schedule: [Note, this proposed schedule is slightly different than the one laid out in the 2000 agreement between the Agencies, but reflects current practice.</p> <p>August 1 – State competitive subgrant solicitation closes, evaluation begins</p> <p>November 1 – State NPS draft workplan due to EPA including subgrants proposed for funding</p> <p>December 31 – EPA comments on draft workplan to state</p> <p>January 31 – State responds to EPA comments</p> <p>February 28 – State sends full application to EPA</p> <p>April 30, or as funds received from Congress- Grant award</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
	Development and implementation of watershed based plans (WBP).	Amy Walkenbach	<p>Annual NPS Program reports required as a condition of 319 grant awards shall, in addition other required items, include lists and schedules of WBPs to be developed and updated in the upcoming FY. Annual Reports shall also identify priority watersheds to be targeted in the request for proposals for NPS implementation projects. (Note: this accomplishment will only be reported in the Annual NPS Program).</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
WQ-14a	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements.	Roger Callaway	<p>Illinois EPA will enter all required NPDES data elements, from the annual reports, submitted by POTW with approved pretreatment programs into ICIS. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are properly entered into ICIS.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

	Pretreatment standards and requirements.	Roger Callaway Sreedevi Yedavalli  Newton Ellens	Twice year, by March 31 and September 30, Illinois EPA will provide number and percent of SIUs discharging to POTWs with approved pretreatment programs.  Region 5 would like to receive copies of the annual reports from POTWs with approved programs.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	Roger Callaway	Maintain major quarterly compliance rate at >=%95. Annual rate will meet or exceed the national goal.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Joint Enforcement actions against SNC facilities	Roger Callaway	U.S. EPA and Illinois EPA will share joint responsibility in taking enforcement actions against ten (10) SNC facilities. Illinois EPA will prepare the enforcement package for U.S. EPA. U.S. EPA will in turn initiate the enforcement action by issuing the AOs. Illinois EPA will provide technical assistance to USEPA with respect to remedies proposed by the SNC facility. USEPA will issue and track the AOs, track compliance with schedule milestones and terminate order upon completion of compliance requirements.	<b>2014 Status:</b>  <b>2015 Status:</b>
Clean Water Action Plan	Resolve State Review Framework items	Bud Bridgewater	By October 31, 2013, Illinois EPA will provide USEPA a draft final Field Procedures Manual for review. The manual will outline the steps for the completion of inspection reports which include appropriate guidelines, procedures, and oversight. The Illinois EPA will follow the national Compliance Monitoring Strategy (CMS) for inspections and will meet the commitments as resources allow.	<b>2014 Status:</b>  <b>2015 Status:</b>

	EPA/State permitting and enforcement joint work plan	Sanjay Sofat	U.S. EPA's and Illinois EPA's joint permitting and enforcement work plan elements have been included in the PPA, as put forwarded in U.S. EPA's CWA Action Plan. Illinois EPA and U.S. EPA will implement the work plan to achieve the desired outcome consistent with the timeframes specified. Illinois EPA and U.S. EPA will re-examine the work plan at regular intervals and make changes, if necessary.	<b>2014 Status:</b>  <b>2015 Status:</b>
Clean Water Acton Plan	Address Minor "Serious" Violators	Roger Callaway	Review non-compliance reports in response to significant violations. Select appropriate Enforcement Response	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway Bud Bridgewater	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	At U.S. EPA's request participate in additional discussion with Region 5 to successfully complete EPA's Municipal Infrastructure National Enforcement Initiative focusing on reducing discharges from CSOs and SSOs, keeping raw sewage and contaminated stormwater out of our nation's waters. To address this, U.S. EPA and Illinois EPA will discuss and investigate Sanitary Sewer Systems (SSSs) with total treatment capacity greater than or equal to 10 MGD and Combined Sewer Systems (CSSs) communities serving population greater than equal to 50,000 that continue to have wet weather compliance issues, to determine the appropriate action, if necessary.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	Review and update "Watch Lists" on a quarterly basis	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	Single event violation (SEVs) entry will be performed along with the entry of major inspections.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Roger Callaway	CSO notifications from municipalities will be entered into ICIS. An approach to tracking SSO notifications will be identified as part of the CSOs strategy that Illinois EPA proposed.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	Illinois EPA will expand the use of electronic reporting to include additional facilities as well as additional types of reports received from wastewater facilities.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Permit Activities	Al Keller	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY14/15.	<b>2014 Status:</b>  <b>2015 Status:</b>

WQ-12a		Al Keller	<p>The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Illinois EPA has been working with several local watershed stakeholders to develop watershed-specific nutrient limits based on Illinois' narrative water quality standard. A process to develop watershed-specific nutrient limits is cumbersome, Illinois EPA will need additional time to develop a nutrient permit limit that is supported by local watershed stakeholders. Because of issues raised on nutrient limits based on the Illinois narrative standard, the number of industrial NPDES permits going to public hearings, and ongoing work to resolve and implement solutions to thermal permitting issues, Illinois EPA commits that 80-85% of majors will be current and 85% of minors will be current. Illinois EPA and Region 5 commit to continuing to identify and implement approaches on nutrient limits based on narrative standard; EPA meeting its goal of reviewing selected proposed permits within 30 days. Agreement to implementing an approach to nutrient limits, continuing to resolve thermal permit issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current and 90% of minor permits will be current."</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
		Darin LeCrone	<p>Review of NPDES permits for power plants with thermal discharges.</p> <ol style="list-style-type: none"> <li>1. Continue to review existing NPDES permit conditions at electric generating facilities for determination of compliance points and include where necessary proper conditions to limit flow and temperature, or to measure compliance or model compliance with applicable standards for each permit renewal.</li> <li>2. Require mixing zone studies where necessary to ensure a measurable compliance point with applicable thermal standards.</li> <li>3. Renewed permits will specify a heat rejection rate where appropriate, to ensure compliance with any applicable</li> </ol>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>



		<p>anti-degradation requirements.</p> <ol style="list-style-type: none"><li>4. Identify permits with 316(a) relief that are expiring in the next 2 to 4 years and notify those facilities that they must submit, with their permit renewal application, updated justification that relief meets 40 CFR 125.72 and demonstrates that any alternative limit protects a balanced and indigenous population.</li><li>5. For renewed NPDES permits, the permit record will provide the assumptions used to demonstrate that thermal standards will not be exceeded.</li></ol> <p>Review of thermal relief for power plant discharges as NPDES permits are renewed.</p> <ol style="list-style-type: none"><li>1. If the relief is clearly through a 316(a) demonstration, those with pending renewals of permits will get a permit condition to submit updated 316(a) demonstration information during the permit cycle. Permit conditions will be included for studies to be conducted to re-justify existing 316(a) relief that address both the nature of the studies to be conducted or submitted, and the time frame for conducting the studies and submitting results. Submitted results will meet 40 CFR125.72 and demonstrate that any alternative limitation protects a balanced and indigenous population.</li><li>2. For permits with no-316(a) relief, Illinois EPA will review the Board opinion/records to evaluate whether the assumptions on which the relief was granted are still accurate and valid. USEPA will provide, as appropriate, its determination regarding the consistency of the relevant Illinois Pollution Control Board orders with the Clean Water Act and federal regulations. The Illinois EPA will evaluate on a case by case basis what additional or alternative permit conditions may be necessary at those facilities from an operational or biological study standpoint.</li></ol>	
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WQ-13a		Al Keller	<u>Stormwater</u> – Illinois EPA has reissued the construction site activity general permit. Illinois EPA will reissue the industrial site and MS4 stormwater general permits upon expiration of these permits. Illinois EPA will monitor any new federal regulations concerning these permits (i.e., effluent guidelines for construction site activities, new MS4 requirements, flow rate related restrictions) and modify the permits as necessary.	<b>2014 Status:</b>  <b>2015 Status:</b>
WQ-19a	Number of high priority state NPDES permits that are issued in the fiscal year.	Darin LeCrone	Develop new priority permit lists for FFY2014 and 2015 in conjunction with Region 5 as soon as practicable near the end of each federal fiscal year for the upcoming year. Issue 100% of the identified priority permits by the end of each FFY.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Darin LeCrone	<u>Permit Backlog List</u> – Illinois EPA will submit a list of major or general permits, expired and expiring, for reissuance by August 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Al Keller Patrick Kuefler	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice. Upon, completion of public notice, Illinois EPA will provide Region 5 for review the proposed permit and Illinois EPA's response to comments.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Al Keller	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility which includes an expansion of a facility.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Al Keller	Finalize and propose Sludge Regulations adoption during FFY14.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Al Keller	Continue to implement the nutrient permitting strategy in permit issuances and reissuances during FFY14, pursuant to Illinois EPA's 11/2/2011 letter to U.S. EPA.	<b>2014 Status:</b>  <b>2015 Status:</b>
Clean Water Action Plan - Permitting for Environmental Results	Extend scope of current permits to ensure WET testing requirements	Bob Mosher	Determine protocol for deciding when more monitoring or limits is necessary for chronic WET by March 15, 2012.	<b>2014 Status:</b>  <b>2015 Status:</b>
	Confined Animal Feeding Operation (CAFO) Work Plan	Dan Heacock	<u>CAFO Rulemaking</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater/Sanjay Sofat	<u>CAFO Inventory and Inventory Updates</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater/Sanjay Sofat	<u>CAFO Inventory and Inventory Updates</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	<u>CAFO Work Load Assessment</u> - Maintain the appropriate level of FTEs to support and manage the CAFO program. Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Dan Heacock	<u>CAFO permit reviews</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Dan Heacock	<u>Incomplete CAFO Permit applications</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
			<u>CAFO Permit Application Tracking</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Dan Heacock	<u>Inform CAFOs of amended CAFO rule and permit requirements</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
			<u>Revise permit application</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
			<u>Propose general permit revisions</u> - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Roger Callaway Bud Bridgewater	Illinois EPA will enter and maintain medium and large permitted CAFOs in ICIS. USEPA will enter the remaining CAFO inventory once it is received from Illinois EPA into ICIS as a one-time support effort. Regarding the long-term maintenance of the CAFO inventory, Illinois EPA staff will maintain the CAFO inventory of permitted and unpermitted CAFOs through an internal Illinois EPA database. Illinois EPA will provide regular updates (semi-annual) to U.S. EPA of the inventory via its internal database system. Illinois EPA will also look into the possibility of providing updates in the form of changes to the inventory, which may reduce the level of effort required to enter and maintain inventory data. What needs to be resolved is the long-term maintenance of the non-permitted CAFO inventory in ICIS. By the end of FY13 the agencies will assess the workload associated with updating the non-permitted CAFO inventory in ICIS and develop a plan for the long-term maintenance of the CAFO inventory beginning in FY14.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	CAFO NPDES annual inspection plan, number of evaluations to be conducted, and enforcement actions and escalation - Refer to attached CAFO Work Plan February 4, 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	CAFO – Site Specific Inspection Plan - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum within six months of their start date, and prior to conducting inspections independently	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	All staff working on AFO/CAFO issues will be trained on the revised ERG.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Roger Callaway	Issue VNs for noncompliance at CAFOs - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	CCA Case Referrals to AG's Office - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater Connie Tonsor Roger Callaway	Quarterly communication on Docket of referred CAFO cases. Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
		Roger Callaway	CAFOs not responding to VN - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater Connie Tonsor Roger Callaway	Quarterly Docket Review of CAFO Referrals - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
	Supplemental Section 106 Funding workplan	Bud Bridgewater	New hires for CAFO Inspections - Refer to attached CAFO Work Plan February 4, 2013	<b>2014 Status:</b>  <b>2015 Status:</b>
	Inspections	Bud Bridgewater	<u>Inspection strategy</u> – An inspection plan, by category, will be sent to Region 5 by September 30 and will include projections for each year and consistency with EPA's National Compliance Monitoring Strategy (CMS). Region 5 will comment on the Illinois EPA plan 30 days after submittal.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	<u>Frequency of inspecting majors</u> – Majors with good compliance history will be reduced. A specific list and schedule of majors to be inspected will be sent to Region 5 by September 30 <sup>th</sup> of each year.	<b>2014 Status:</b>  <b>2015 Status:</b>

		Bud Bridgewater	<u>Reconnaissance inspections</u> – Recon inspections will continue, as resources allow.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bud Bridgewater	<u>Stormwater inspections in conjunction with SWCDs</u> - Agreements are in place with the SWCDs. These agreements govern to operations of this inspection and technical assistance program.	<b>2014 Status:</b>  <b>2015 Status:</b>
		Bob Mosher	Illinois EPA will continue to implement the elements of the nutrient plan.	<b>2014 Status:</b>  <b>2015 Status:</b>
Joint Priority	Promote the use of anaerobic digesters in Illinois	Marcia Willhite	Anaerobic digesters are used to break down organic wastes and convert them into heat and methane gas, which can then be used to produce electricity. Digesters can be used to manage agricultural wastes to address problems with waste lagoons, impaired water quality, particulate matter, odors, pests and carbon dioxide, while producing renewable energy, and if placed on a brownfield or other contaminated property, can contribute to reuse and redevelopment of such properties. Illinois EPA and EPA agree to work together to promote the increased use of anaerobic digesters through data sharing, outreach to stakeholders, and prioritization of permits and other regulatory approvals for digester projects.	<b>2014 Status:</b>  <b>2015 Status:</b>

Joint Priority	Data Synchronization in ICIS	Marcia Willhite	The Integrated Compliance Information System (ICIS) is used directly by the Illinois EPA to evaluate NPDES compliance. It is also used as a source of information for USEPA and the public ( via ECHO) on the performance of Illinois EPA's compliance program. Synchronization of data between what Illinois EPA enters and what USEPA draws from the system is crucial, particularly when developing Quarterly Non-Compliance reports (major dischargers) and Annual Non-Compliance Reports (minors). Yet, Illinois EPA continues to spend much time and effort correcting data errors when preparing required reports or fielding calls from dischargers and the public when erroneous data appears in ECHO. Illinois EPA and USEPA will work together to identify the root causes of data discrepancies and propose/implement solutions.	<b>2014 Status:</b>  <b>2015 Status:</b>
Environmental Justice	Screen all incoming permit actions/applications for potential Environmental Justice issues.	Ken Page	In accordance with the Environmental Justice (EJ) Public Participation Procedure report all proposed permitting actions for facilities located in potential EJ areas as determined by Illinois EPA's screening tool to the EJ Officer for further outreach.	<b>2014 Status:</b>  <b>2015 Status:</b>

#### **DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN**

With regard to Illinois' Drinking Water Resource Deployment Plan (PPA), during the week of November 28, 2011, a "team," consisting of representatives of U.S. EPA and The Cadmus Group, Inc., conducted a triennial review at the IEPA and the Illinois Department of Public Health (IDPH). A report of this review was prepared by The Cadmus Group on December 29, 2011. This report identified areas of quality improvement, but generally recognized that every attempt is made by both the Illinois EPA and IDPH to assure public health protection and administration of all of the elements within the Resource Deployment Plan.



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)**

**Fiscal Year 2014-and 2015  
(October 1, 2013 to September 30, 2015)**

Not all State Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Resource shortfalls have occurred as the regulations, mandated by the Safe Drinking Water Act (SDWA), come into effect.

Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the SDWA is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

To that end, Region 5, in cooperation with our State program partners, has developed a program plan that includes all of the major activities required by primacy regulations and primary drinking water regulations, to guide annual workplan and/or EnPPA discussions leading to annual grant commitments and work-sharing agreements. The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. For instance, in a state where radionuclides are prevalent, the state may need to devote proportionately more resources to implementing that regulation than another state, where arsenic is more prevalent.

Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority-setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of State programs are listed in the table. Priority activities are flagged throughout the ARDP (denoted with a triangle ►), which will be tracked more than once per year.

The State and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the State and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both State and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.
- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

**PUBLIC WATER SYSTEM SUPERVISION PROGRAM**  
**CORE STATE ACTIVITIES**

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent State decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.<sup>1</sup>
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

<sup>1</sup> States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

**CORE R5 ACTIVITIES**

Respond to questions from our state programs about regulations. Train state staff about treatment regulations by offering in-state and/or regional training opportunities.

Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.

- Track primacy submittal/review for all rules and provide comments on draft rules, as requested.
- Determine whether primacy applications are complete and determine tracking required for new rules by state.

Assist states in acquiring resources to carry out all functions of the PWSS program.

Monitor specific regulations related to State follow-up to the findings of the last data and enforcement verification reports, as indicated in the “R5 Activities” column.

<b>Acronyms/Abbreviations</b>	
<p>ACS – Annual Commitment System  ARDP – Annual Resource Deployment Plan  As – Arsenic  CCR – Consumer Confidence Report  CFR – Code of Federal Regulations  CPE – Comprehensive Performance Evaluation  CTA – Comprehensive Technical Assistance  CWA – Clean Water Act  CWS – Community Water System  DBP – Disinfection By-Products  D/DBPR – Disinfectants and Disinfection By-Products Rule  DWA – Drinking Water Academy  DWSRF – Drinking Water State Revolving Fund  eDV – Electronic Data Verification (Tool)  EnPPA – Environmental Performance Partnership Agreement  ERG – Expense Reimbursement Grant  ERP – Enforcement Response Policy  ETT – ERP Enforcement Targeting Tool  FBRR – Filter Backwash Recycling Rule  GWR – Ground Water Rule  GWS – Ground Water System  GUDI – Ground Water under the Direct Influence of Surface Water  HAA5 – Haloacetic Acids  HSA – Hydrogeologic Sensitivity Assessment  IDSE – Individual Distribution System Evaluation  IESWTR – Interim Enhanced Surface Water Treatment Rule  IOC – Inorganic Contaminant  IUP – Intended Use Plan  LCR – Lead and Copper Rule  LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule  LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule  MCL – Maximum Contaminant Level  M/R – Monitoring/Reporting</p>	<p>MRDL – Maximum Residual Disinfectant Level  NCWS – Non-Community Water System  NPDWR – National Primary Drinking Water Regulation  NTNCWS – Non-Transient Non-Community Water System  OCCT – Optimal Corrosion Control Treatment  pCi/L – picoCurie per liter  PN – Public Notification  ppb – part per billion  PWS – Public Water System  PWSID – Public Water System Identification  PWSS – Public Water System Supervision  Rads – Radionuclides  RTC – Returned to Compliance  SDWA – Safe Drinking Water Act  SDWIS/FED – Safe Drinking Water Information System/Federal  SDWIS/State – Safe Drinking Water Information System/State  SNCs – Significant Non-Compliers  SOC – Synthetic Organic Contaminant  SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation  SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager  Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule  SWAP – Source Water Assessment Program  SWP – Source Water Protection  SWTR – Surface Water Treatment Rule  TCR – Total Coliform Rule  TMDL – Total Maximum Daily Load  TT – Treatment Technique  TTHM – Total Trihalomethanes  UCMR – Unregulated Contaminant Monitoring Rule  V&amp;E – Variances and Exemptions  VOC – Volatile Organic Contaminant  WBDO – Waterborne Disease Outbreak  WQP – Water Quality Parameter</p>

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**Attachment B: Unregulated Contaminant Monitoring Rule (UCMR) Partnership Agreement (placeholder)**

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.1 – Adopt all rules in a timely manner (within two year extension period)</p> <p>Issue: “There are concerns that the emerging technologies associated with LT2SWTR (ultraviolet light disinfection and membrane filtration specifically) are increasingly difficult due to their complexity and lack of staff capable of devoting sufficient time to study the issues. Additional staff in the Permit Section is desirable to devote adequate resources to them.”</p>	Illinois EPA has adopted the rules above and is implementing provisions of the rules thru inspections and providing training, technical assistance and taking enforcement actions as necessary.	Region 5 is currently working on the primacy approval for the Radionuclide Rule and the Interim Enhanced Surface Water Treatment Rule.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
1.2 – Notify all surface water and GUDI systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.	Data is maintained in SDWIS/State.		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Data is maintained in SDWIS/State and will be used to update SDWIS/FED.	<p>► Region 5 will evaluate extent to which LT2 violations are reported to SDWIS/FED.<sup>i</sup></p> <p>New Rule Violations as of April 2013 (2010-2012 data) –</p> <p>M/R – LT2 ESWTR - 1</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
<p>1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	Illinois has committed to completing 90% of the surface water sanitary surveys under the national measures.	<p>Provide training, as requested.</p> <p>► Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).<sup>ii</sup></p> <p>As of April 2013 (2010-2012 data)</p> <p>CWS - 86 not completed, 490 completed, 576 total systems. 85.1%</p> <p>NTNCWS – 0 not, 7 completed, 7 total. 100%</p> <p>TNCWS - 0 not, 123 completed, 123 total. 100%</p> <p>This national measure will be finalized in July 2013. It will be measured again in July 2014 for the period of 2011 to 2013.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at alternate location approved by the State.	Replies have been received from all surface water supplies.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.9 – Follow-up on turbidity TT violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
1.10 – Follow-up on individual filter turbidity M/R violations. <b>a.</b> Track	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
individual filter turbidity trigger exceedances. <b>b.</b> Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.			<b>2015 Status:</b>
1.11 – When required, track the completion of CPE/CTA for PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.12 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.13 – Follow-up on disinfection residual TT violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested	<b>2014 Status:</b>  <b>2015 Status:</b>
1.14 – Follow up on disinfection residual M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested	<b>2014 Status:</b>  <b>2015 Status:</b>
1.15 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.16 – Ensure that disinfection profiling and benchmarking is conducted when required by rule.	Ongoing – will continue		<b>2014 Status:</b>  <b>2015 Status:</b>



Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.17 – Ensure that all required records are kept by surface water systems.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
1.18 – Complete remaining GUDI determinations.	Ongoing – will continue		<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
2.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.	Ongoing – will continue. Tracked in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
2.3 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
2.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
<p>2.5 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. Illinois is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Groundwater Section staff are updating source water assessments and Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.</p>		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
2.6 – Follow-up on all M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.1 – Adopt the GWR in a timely manner (within two year extension period).	The IPCB adopted the GWR on 7/27/2007 and the Primacy Application was delivered to Region 5 on 11/3/2009.	GWR primacy was approved on July 29, 2013.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
3.2 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	<i>States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.</i> The Illinois EPA has not yet encountered limitations.	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	<b>2014 Status:</b>  <b>2015 Status:</b>
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Data will be tracked in SDWIS/State and transferred to SDWIS 3.0 when available.	<p>► Region 5 will evaluate extent to which GWR violations are reported to SDWIS/FED.<sup>1</sup></p> <p>New Rules: Violations as of April 2013 (2010-2012 data) –</p> <p>M/R – GWR – 8</p> <p>Other – GWR – 1</p>	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by <b>12/31/12</b> at CWSs and then every 3 years thereafter, and by <b>12/31/14</b> at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p> <p>Issue: (same issues regarding staff resource as in LT2SWTR in 1.1)</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Reports will be made as resources allow.</p>	<p>► Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).<sup>2</sup></p> <p>As of April 2013 (2010-2012) data</p> <p>CWS – 271 not, 883 completed, 1154 total. 76.5%</p> <p>NTNCWS – 8 not, 352 completed, 360 total. 97.8%</p> <p>TNCWS – 42 not, 2833 completed, 2875 total. 98.5%</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	Treatment will be required when necessary to ensure a multi-barrier protection strategy at all community water supplies in Illinois		<b>2014 Status:</b>  <b>2015 Status:</b>
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	Illinois EPA is implementing a groundwater rule implementation strategy approved by Region 5.  Illinois DPH will implement the triggered source water monitoring requirements by the compliance date specified in the GWR		<b>2014 Status:</b>  <b>2015 Status:</b>
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	See 3.7 above.		<b>2014 Status:</b>  <b>2015 Status:</b>
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ongoing – follow up actions will be taken as appropriate.		<b>2014 Status:</b>  <b>2015 Status:</b>
3.10 – Follow-up on corrective action consultation and reporting violations.	Ongoing – follow up actions will be taken as appropriate.		<b>2014 Status:</b>  <b>2015 Status:</b>
3.11 – Follow-up on M/R violations.	Ongoing – follow up actions will be taken as appropriate.		<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.12 – Follow-up on public notification violations.	Ongoing – follow up actions will be taken as appropriate.		<b>2014 Status:</b>  <b>2015 Status:</b>
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ongoing – follow up actions will be taken as appropriate.		<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
4.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
4.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.5 – Follow-up on M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).	<p>Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented.</p> <p>Illinois DPH has submitted milestone data to the ODS and will continue updating data.</p>		<b>2014 Status:</b>  <b>2015 Status:</b>
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented.		<b>2014 Status:</b>  <b>2015 Status:</b>
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 <sup>th</sup> percentile action level sample data for all large and medium sized systems, and 90 <sup>th</sup> percentile action level exceedance sample data for small systems.	Ongoing – will continue. Tracked in SDWIS/State.	<p>Region 5 will finalize the LCR module of the compliance determination and violation reporting training (CDVRT).</p> <p>► Region 5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.<sup>1</sup></p> <p>New Rules: Violations as of April 2013 (2010-2012 data)</p> <p>M/R - LCR - 180</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
5.7 – Follow-up on all M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
5.8 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.	Ongoing– will continue.	Region 5 will assist as necessary, or as requested.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
5.9 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.			<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>



Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted LT2 & Stage 2 rules and Illinois EPA & Illinois DPH are in the process of implementing the regulations.		<b>2014 Status:</b>  <b>2015 Status:</b>
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	Data will be maintained in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State	<p>► Region 5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED.<sup>1</sup></p> <p>New Rules: Violations as of April 2013 (2010-2012 data) –</p> <p>TT –7</p>	<b>2014 Status:</b>  <b>2015 Status:</b>
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.6 – Follow-up on all other MCL/MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
6.8 – Follow-up on all M/R violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Ongoing – will continue		<b>2014 Status:</b>  <b>2015 Status:</b>
6.10 – Follow-up on all other reporting requirement violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
7.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted IOC Rules and they are being implemented (including arsenic).		<b>2014 Status:</b>  <b>2015 Status:</b>
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.	As of January 2013, there were 0.5% CWS, 0.2% NTNCWS and 0.0% TNCWS not RTC'd of the active systems for 2012.	<b>2014 Status:</b>  <b>2015 Status:</b>
7.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
7.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted Radionuclide Rules and they are being implemented.		<b>2014 Status:</b>  <b>2015 Status:</b>
8.2 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
8.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
8.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
8.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
8.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC</b>			
9.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
9.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
9.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
9.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
9.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>10.0 – VOCs</b>			
10.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line		<b>2014 Status:</b>  <b>2015 Status:</b>
10.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.	Ongoing – will continue. Tracked in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
10.3 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
10.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>
10.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>11.0 – Organic and Inorganic Chemical Monitoring Waiver Program</b>			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.	<p>Changes to the approved program not needed during the reporting period.</p> <p>Applicable system's waivers will be evaluated during the appropriate compliance period.</p>		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>12.0 – Sodium</b>			
12.1 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
12.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.	Ongoing – will continue. Tracked in SDWIS/State.		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
12.3 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	Ongoing – will continue.		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
12.4 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>
Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation

<b>13.0 – Public Notification</b>			
13.1 – Notify all public water systems of their public notification requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<b>2014 Status:</b>  <b>2015 Status:</b>
13.2 – Maintain a data base management system that accurately tracks PN violations.	Ongoing – will continue. Tracked in SDWIS/State		<b>2014 Status:</b>  <b>2015 Status:</b>
13.3 – Electronically report all public notification violations to SDWIS/FED.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
13.4 – Follow-up on all Tier 1, 2 & 3 violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Privacy Activities

<b>Activity Components</b>	<b>State Commitment</b>	<b>Region 5 Activities</b>	<b>State/U.S. EPA Evaluation</b>
<b>14.0 – CCR</b>			
14.1 – Notify all regulated water systems of their CCR requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (see <a href="http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf">http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf</a> ).	<b>2014 Status:</b>  <b>2015 Status:</b>
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>



Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>14.0 – CCR</b>			
14.3 – Electronically report all CCR violations to SDWIS/FED.	Ongoing – will continue. Tracked in SDWIS/State.		<b>2014 Status:</b>  <b>2015 Status:</b>
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<b>2014 Status:</b>  <b>2015 Status:</b>

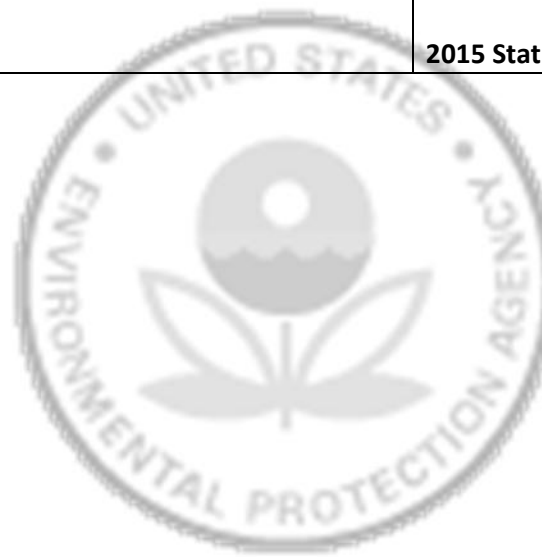
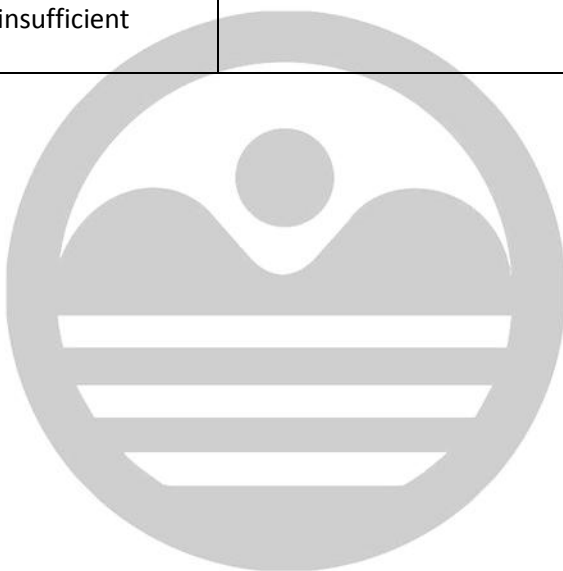


Table 1. Primacy Activities


Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>15.0 – Laboratory Certification</b>			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the <u>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>Issue: “State travel restrictions continue to prevent the training of additional staff to provide back-up for conducting the on-site laboratory assessments”</p>	<p>Illinois does require that all laboratories be certified for SDWA sample result submission and certification occurs every two years. The laboratories are certified to NELAC standards which are equivalent to the EPA Manual. At this time, third parties are not being used to conduct on-site visits.</p> <p>The Illinois EPA will pursue regulatory changes to accept third party certification of radiological samples. Additionally, the Illinois EPA will evaluate long term solutions to Radiological Lab Certification in Illinois.</p>		<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
16.1 – Participate with Region 5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.	Illinois EPA and Illinois DPH commit to participate in PWS program reviews for CWS & NCWS.		<b>2014 Status:</b>  <b>2015 Status:</b>
16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.	Ongoing – will continue. Tracked in SDWIS /State	Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.	<b>2014 Status:</b>  <b>2015 Status:</b>
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	Ongoing – will continue.	Assist with enforcement referrals, analysis, and data clean up or other joint efforts as requested by state.	<b>2014 Status:</b>  <b>2015 Status:</b>
16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	Ongoing – Illinois EPA will continue to provide timely updates to USEPA-Region 5 requests.	Each quarter, Region 5 will send the states updated ERP reports requesting a state update. Region 5 will integrate State updates into reports before the next request is sent out.	<b>2014 Status:</b>  <b>2015 Status:</b>
16.5 – Electronically report state formal enforcement actions, return	The State will update SDWIS/FED with this information quarterly, and		<b>2014 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		<b>2015 Status:</b>
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2013 and June 2014.	The Illinois EPA has adopted legislation making current Compliance Commitment Agreements enforceable. This measure has been completed.	► Region 5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management</b>			
17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.	For each data submission with errors, the State will contact the Region about their plans for fixing the errors.	Provide technical assistance and program assistance to all Region 5 States related to data management.	<b>2014 Status:</b>  <b>2015 Status:</b>
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):  17.3a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.	Since data management is critical to each State’s ability to maintain primacy, when possible, the State will continue to send a representative to the annual ASDWA Data Management Users conference.  Note: Item 17.3g has been Completed and data will continue	Region 5 is continuing to develop compliance determination and violation reporting training (CDVRT). The LCR CDVRT module is nearly complete. In addition, we are trying to obtain funding to complete the remaining modules.  <b>April 2013</b> frozen data: In 2012, Illinois showed 98.4% of its TCR	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management</b>			
<p>17.3b – State will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3e – The State will work with the Region to test/evaluate the eDV tool.</p> <p>17.3f – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State's plans or schedule to use them including the eDV tool.</p> <p>17.3g – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p>	to be updated.	<p>reporting on-time. Excellent improvement.</p> <p><b>April 2013</b> data freeze: 100% of 2012 nitrate reporting is on-time. This is excellent.</p> <p>Region 5 requests that IL copy Region 5 when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.</p>	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>18.0 – Annual Compliance Report</b>			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.	Illinois EPA will provide future reports by July 1 <sup>st</sup> of each calendar year-	OECA to provide annual ACR guidance. R5 will forward guidance when received.	<b>2014 Status:</b>  <b>2015 Status:</b>
<b>19.0 – Variances and Exemptions</b>			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	This is not applicable to Illinois.		

Table 1. Primacy Activities					
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals					
20.1 – Gather information to track strategic plan progress.	Illinois EPA will report these measures through the PPA.	Compile information and report to HQ.	Goal:	EOY:	
State directors will attend the annual Region 5 state directors meeting in April 2014 and April 2015 to discuss primacy and implementation issues.		Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of	Milestone 1	≥95.0%	96.8%
			Milestone 2	≥95.0%	100%
			Milestone 3	<5.0%	2.8%
			Milestone 4	<10.0%	9.5%
			Milestone 5	<5.0%	0.5%
			Milestone 6	<10.0%	24.4%
			Milestone 7	<10.0%	0.1%
			See shared goals descriptions at end of document.		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals</b>			
		<p>budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.</p> <p>Region 5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Preparing for Security Threats at PWSS</b>			
1.1 – State-specific security work plan activities.	The Illinois EPA will verbally report security activities as needed by U.S. EPA Region 5.	<p>Review work plan updates.</p> <p>Hold quarterly conference calls with state security contacts.</p>	
1.2 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.	Illinois EPA has planning documents in association with the Illinois Emergency Management Agency. Based upon resource limitation, sector specific plans may be evaluated in the future to augment existing plans.		



Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.	The Illinois EPA will continue to provide these reports annually.	Coordinate information and issues on Op Cert Program implementation and annual reports.	<b>2014 Status:</b>  <b>2015 Status:</b>
2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators and (2) provide training and opportunities for upgrading and renewing certification for existing operators.	Ongoing – will continue.		<b>2014 Status:</b>  <b>2015 Status:</b>
2.3 – Provide supplemental certification and training to water system operators on relevant topics from section 7.0 “Sustainable Infrastructure” of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.	The Illinois EPA will coordinate with USEPA-Region 5 on this activity.	Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.	Illinois EPA will provide future reports by December 31 of each calendar year.	Region 5 will send a reminder to the State about the capacity development annual report in August 2014 and August 2015.	<b>2014 Status:</b>  <b>2015 Status:</b>
3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.	IEPA will provide future reports to the governor as appropriate.  Reports will be submitted by October annually.	Region 5 will send a reminder to the State about the report to the governor in August 2013.	<b>2014 Status:</b>  <b>2015 Status:</b>
3.3 – Promote “Sustainable Infrastructure” activities as described in section 7.0 of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	Illinois EPA staff continues to seek efficiencies to encourage Capacity Development at community water supplies.		<b>2014 Status:</b>  <b>2015 Status:</b>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.1 – Update source water assessments, as resources allow.	Ongoing – will continue.		
4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	<p>SWP plan development and implementation will be achieved with assistance from the following SWC partners:</p> <p>Illinois EPA will continue to work with the IRWA and local stakeholder to encourage regulatory and non-regulatory protection programs.</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance. The next meeting is in Chicago on October 15-17, 2013.</p> <p>Encourage interstate communication through conference calls and an annual State–Region 5 EPA meeting.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012.</p>	<p>Illinois EPA- Groundwater Section staff are updating source water assessments and will evaluate the most efficient mechanism to report program measures to the USEPA-Region 5.</p>	<p>Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.</p> <p>For 2012:            % of CWS with minimized risk b/c of SWP 46.5%. Target not met, 50%.            % of population served by CWSs with minimized risk b/c of SWP 69.9%, which exceeds the target of 42%.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.	Illinois EPA continues to actively coordinate program activities between Clean and Safe Drinking Water Act program, both within the Bureau of Water. Such activities include coordination on Clean Water Act Section 319, Mine Program, NPDES and sludge application programs. Additionally, the Interagency Coordinating Committee and Groundwater Advisory Council continue to meet on a quarterly basis which brings together planning impetus with Agricultural and Resource based Agencies as well as Regulatory Program areas.	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	Ongoing – will continue.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – DWSRF</b>			
5.1 – Implement all required activities.	Ongoing – will continue.	Review IUP and set-aside workplans.  Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report</b>			
6.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State's PWSS program to support the various components of the PWSS program implementation logic model.	Illinois EPA will continue to coordinate with USEPA Region 5.	Use the logic model to improve our ability to understand measure, assess, and communicate progress.  SPM will work with state program to determine state-specific approach, and schedule.	<b>2014 Status:</b>  <b>2015 Status:</b>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – Sustainable Infrastructure</b>			
7.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.	Illinois is evaluating continuing the small systems compliance grant program. This program is designed to provide financial capacity by awarding grants to very small community water supplies. This grant program was initially funded through DWSRF loan repayments. Funding sources are being evaluated at this time for continuation of the program.	<p>Participates in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>► Region 5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	<p><b>2014 Status:</b></p> <p><b>2015 Status:</b></p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Environmental Justice</b>			
8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.	Ongoing – will continue.	Region 5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools as an interim screening approach.	<b>2014 Status:</b>  <b>2015 Status:</b>



## Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA’s Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2014 National Water Program Guidance:  
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures**

NOTE: The information in the table below is based on final FY2014 measures at [http://www.epa.gov/planandbudget/annualplan/FY14\\_OW\\_NPM\\_Gdnce.pdf](http://www.epa.gov/planandbudget/annualplan/FY14_OW_NPM_Gdnce.pdf), [http://www.epa.gov/planandbudget/annualplan/FY14\\_OECA\\_NPM\\_Gdnce.pdf](http://www.epa.gov/planandbudget/annualplan/FY14_OECA_NPM_Gdnce.pdf), and <http://www.epa.gov/ace/contaminants/#drinking>.

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-211	By FY2014, <b>90</b> percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. State FY14 and 15 target:
SDW-SP1.N11	By FY2014, <b>90</b> percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. State FY14 and 15 target:
SDW-SP2	By FY2014, CWSs will provide drinking water that meets all applicable health-based drinking water standards during <b>95</b> percent of “person months” (i.e., all persons served by CWSs times 12 months). State FY14 and 15 target:
SDW-SP4a	By FY2014, minimize risk to public health through source water protection for <b>50</b> percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-SP4b	By FY2014, minimize risk to public health through source water protection for <b>42</b> percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-01a	By FY2014, <b>90</b> percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules and the Ground Water Rule. State FY14 and 15 target:

OW ACS code	<b>Goal 2: Clean and Safe Water</b> <b>Subobjective 2.1.1: Water Safe to Drink</b>
SDW-03	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. <b>This is an indicator that HQ reports.</b>
SDW-04	In FY2014, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). <b>HQ reports.</b>
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). <b>HQ reports.</b>
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. <b>This is an indicator that HQ reports.</b>
SDW-12	Percent of DWSRF dollars awarded to small PWSs serving <500, 501-3,300, 3,301-10,000 consumers. <b>This is an indicator that HQ reports.</b>
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. <b>This is an indicator that HQ reports.</b>
SDW-14	Number and percent of CWSs and NTNCWSs, including new PWSs, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). <b>This is an indicator that HQ reports.</b>
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. <b>This is an indicator that HQ reports.</b>
SDW-16	Average time for small PWSs (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). <b>This is an indicator that HQ reports.</b>
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. <b>This is an indicator that HQ reports.</b>
OECA ACS code	<b>Goal 5: Compliance and Environmental Stewardship</b> <b>Subobjective 5.1.2: Address Environmental Problems from Water Pollution</b>
5.1.2 (SDWA02)	During FY2014, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2013 ETT report <sup>iii</sup> .
Measure	<b>America's Children and the Environment, Third Edition (ACE3)</b> <b>Drinking Water Contaminants</b>
E6	Percentage of children served by CWSs that did not meet all applicable health-based drinking water standards. <b>This is an indicator that HQ reports.</b>
E7	Percentage of children living in areas served by CWSs with violations of drinking water monitoring and reporting requirements. <b>This is an indicator that HQ reports.</b>

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<sup>i</sup> **NEW RULE VIOLATION REPORTING QUERY:** The new rule violation reporting query includes all violations for the new rules ever reported for any system type regardless of activity status, which means that there may be violations reported for currently closed systems. The specific rule violation codes included in this query are:

- LCRSTR – 66
- Stage 2 – 30, 35
- LT2 – 32, 33, 37/0800, 41/0800, 42/0800, 45/0800, and 47/0800
- GWR – 31/0700, 34, 41/0700, 42/0700, 45/0700, 48, 73 (36/0700 was an old code programmed into SDWIS/State)

<sup>ii</sup> **SANITARY SURVEY COMPLETENESS QUERY:** The sanitary survey completeness query includes data for all currently active systems. A national measure tracks sanitary survey completeness at surface CWSs as indicated in attachment A (see SDW-1a). The data from the appropriate reporting period will be frozen and considered final at in July of every years.

<sup>iii</sup> A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2014 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.

**SHARED GOALS:**

By 2016:

1. % of NTNCWS meeting all health based standards CY 2006-12
2. % of TNCWS meeting all health-based standards CY 2006-12
3. % of population served by CWS with significant/major monitoring violations CY2006-12
4. % of CWS with significant/major monitoring violations CY 2006-12
5. % of NTNCWS with significant/major violations for acute health risks (NO3, microbial and SWT) CY 2006-12
6. % of NTNCWS with significant/major monitoring violations for chronic health risks CY 2006-12
7. % of TNCWS with significant/major monitoring violations CY 2006-12